

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

LADY MAAKIA CHARLENE SMITH,
personal representative of the Estate of BILAL
HASANIE HILL, deceased,

Plaintiffs,

vs.

ADVANCED CORRECTIONAL
HEALTHCARE, INC.; DR. ARTHUR
BENTLEY, Individually and in His Official
Capacity as a Medical Services Provider at
Phelps County; DIONNE KELLEY; KELLY
RATCLIFF, LIEUTENANT JOE TAYLOR;
DR. TRAVIS SCHAMBER,

Defendants.

Case No. 4:20-CV-00804-JMB

JOINT STIPULATION OF UNCONTESTED FACTS

1. Bilal Hill was a federal detainee confined at Phelps County Jail from October 2019 through April 2020.
2. Advanced Correctional Healthcare, Inc. (ACH) is a healthcare provider, which contracts with Phelps County Jail to provide healthcare services.
3. At all times while Plaintiff was incarcerated at Phelps County Jail, Dionne Kelley was the site nurse placed at Phelps County Jail by ACH. She was on site 40 hours per week usually 8 hours/day, Monday – Friday.
4. At all times while Plaintiff was incarcerated at Phelps County Jail, Dr. Arthur Bentley was the site doctor and visited the Phelps County Jail one day per week.
5. On October 4, 2019, Bilal Hill was booked into the Phelps County Jail.
6. Mr. Hill's first sick call request was on January 13, 2020.
7. Mr. Hill saw Dr. Bentley and Nurse Kelley on January 14, 2020.
8. Nurse Kelley saw Mr. Hill on January 27, 2020 and called Dr. Bentley.
9. Nurse Kelley saw Mr. Hill on February 6, 2020 and called Dr. Bentley.

10. Mr. Hill saw Dr. Bentley on February 12, 2020.
11. Nurse Kelley saw Mr. Hill on February 21, 2020 and called Dr. Bentley.
12. Mr. Hill saw Dr. Bentley on February 26, 2020.
13. Nurse Kelley saw Mr. Hill to attempt to draw blood for lab work on March 4, 5, and 6, 2020.
14. Mr. Hill saw Dr. Bentley on March 18, 2020.
15. Nurse Kelley saw Mr. Hill on March 27, 2020 and called Dr. Bentley.
16. Nurse Kelley saw Mr. Hill on March 28, 2020, and scheduled him to be seen by Dr. Bentley at his next visit.
17. Mr. Hill saw Dr. Bentley on April 1, 2020, and Dr. Bentley ordered Mr. Hill be sent to the hospital. His weight had dropped to 168 lbs. He lost 28 lbs. since January 27, 2020.
18. When Mr. Hill exercised, Mr. Hill's exercise regime included pushups, dips, squats, running in place, jumping jacks, and calisthenics.
19. On April 1, 2020, Mr. Hill was evaluated in the emergency room at Phelps County Regional Hospital. After performing an MRI the doctors diagnosed him with terminal lung cancer.
20. Phelps County Regional transferred Mr. Hill to Cox Health in Springfield, Missouri where he was evaluated by Dr. Fawks.
21. Following his terminal cancer diagnosis in April 2020, Mr. Hill lived with his sister, Plaintiff Lady Smith, at her home in Charlotte, North Carolina until Mr. Hill's death on January 14, 2021.

ADDITIONAL JOINT STIPULATION

The parties stipulate that any medical and jail records are admissible without requiring authentication by affidavit, declaration or custodian of records testimony, but that other objections are not waived.

Dated this 25 day of April 2022.

Respectfully submitted,

/s/ Charles C. Eblen

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